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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No.
)
Plaintiff,) <u>COUNTS 1, 3, 4, 6, and 7:</u>
) PRODUCTION AND ATTEMPTED
vs.) PRODUCTION OF CHILD
) PORNOGRAPHY
OLIVER STEWART REING,) Vio. of 18 U.S.C. § 2251(a),(e)
)
Defendant.) <u>COUNT 2 and 5:</u>
) COERCION AND ENTICEMENT AND
) ATTEMPTED COERCION AND
) ENTICEMENT OF A MINOR
) Vio. 18 U.S.C. § 2422(b)
)

I N D I C T M E N T

The Grand Jury charges that:

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COUNT 1

Between on or about June 11, 2018, and on or about June 23, 2018, in the District of Alaska and elsewhere, the defendant, OLIVER STEWART REING, did knowingly employ, use, persuade, induce, entice, and coerce a minor, and attempt to do so, to wit: "M.L.," with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce, was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and was transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce.

All of which is in violation of 18 U.S.C. § 2251(a), (e).

COUNT 2

Between on or about July 9, 2018, and on or about July 10, 2018, in the District of Alaska and elsewhere, the defendant, OLIVER STEWART REING, did, using a facility and means of interstate and foreign commerce, knowingly persuade, induce, entice, and coerce a minor, and attempt to do so, to wit: "D.P." an individual who he knew had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, including, Production and Attempted Production of Child Pornography, in violation of 18 U.S.C. § 2251(a), (e).

All of which is in violation of 18 U.S.C. § 2422(b).

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COUNT 3

Between on or about July 9, 2018, and on or about July 10, 2018, in the District of Alaska and elsewhere, the defendant, OLIVER STEWART REING, did knowingly employ, use, persuade, induce, entice, and coerce a minor, and attempt to do so, to wit: "D.P.," with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce, was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and was transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce.

All of which is in violation of 18 U.S.C. § 2251(a), (e).

COUNT 4

Between on or about November 21, 2018, and on or about December 19, 2018, in the District of Alaska and elsewhere, the defendant, OLIVER STEWART REING, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, to wit: "H.W.," with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce, was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and was transported and transmitted

using any means and facility of interstate and foreign commerce, and in and affecting
interstate and foreign commerce.

All of which is in violation of 18 U.S.C. § 2251(a), (e).

COUNT 5

Between on or about December 29, 2018, and on or about December 31, 2018, in the
District of Alaska and elsewhere, the defendant, OLIVER STEWART REING, did, using a
facility and means of interstate and foreign commerce, knowingly attempt to persuade,
induce, entice, and coerce a minor, to wit: "B.S." an individual who he knew had not attained
the age of 18 years, to engage in any sexual activity for which any person can be charged with
a criminal offense, including, Production and Attempted Production of Child Pornography,
in violation of 18 U.S.C. § 2251(a), (e).

All of which is in violation of 18 U.S.C. § 2422(b).

COUNT 6

Between on or about December 29, 2018, and on or about December 31, 2018, in the
District of Alaska and elsewhere, the defendant, OLIVER STEWART REING, did knowingly
attempt to employ, use, persuade, induce, entice, and coerce a minor, to wit: "B.S.," with the
intent that such minor engage in sexually explicit conduct for the purpose of producing a
visual depiction of such conduct, knowing that such visual depiction will be transported and
transmitted using any means and facility of interstate and foreign commerce, was produced
using materials that have been mailed, shipped, and transported in and affecting interstate and
foreign commerce by any means, including by computer, and was transported and transmitted

using any means and facility of interstate and foreign commerce, and in and affecting
interstate and foreign commerce.

All of which is in violation of 18 U.S.C. § 2251(a), (e).

COUNT 7

Between on or about December 22, 2018, and on or about January 10, 2019, in the District of Alaska and elsewhere, the defendant, OLIVER STEWART REING, did knowingly employ, use, persuade, induce, entice, and coerce a minor, and attempt to do so, to wit: a 14-year-old female in Michigan, with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce, was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and was transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce.

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All of which is in violation of 18 U.S.C. § 2251(a), (e).

A TRUE BILL.

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

s/ Kyle Reardon

KYLE REARDON

Assistant U.S. Attorney
United States of America

s/ Bryan Schroder

BRYAN SCHRODER

United States Attorney
United States of America

DATE: February 20, 2020